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March 21, 2022

Via ECF

The Honorable Cheryl L. Pollak
Chief Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Torres, et al v. Midas Contractors Corp., et al
Case No.: 1:21-cv-4609 (PKC) (CLP)

Dear Chief Judge Pollak:

We are counsel to defendants Midas Contractors Corp. and Ximena Andrea Andrade (collectively, the "Midas Defendants") in this matter and write pursuant to Your Honor's Individual Practice Rules to respectfully request an extension of time to respond to the Amended Complaint to April 22, 2022. This is the Midas Defendants' first request for an extension of time to respond to the Amended Complaint. Despite multiple attempts, we were unable to reach Plaintiffs' counsel to discuss this application.

Per ECF, the Midas Defendants' response to the Amended Complaint is currently due March 24, 2022. The extension is requested to enable our law firm to conduct its review of the allegations contained in the Amended Complaint and provide a complete and accurate response. Accordingly, the Midas Defendants respectfully request to respond to the Amended Complaint by April 22, 2022.

Thank you for your consideration and assistance.

Respectfully submitted,

/s/ Andrew T. Williamson

CC: all counsel of record (by ECF)